

U.S. Department of Justice
Washington, DC 20530

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Exhibit A to Registration Statement

**Pursuant to the Foreign Agents Registration Act of
1938, as amended**

INSTRUCTIONS. Furnish this exhibit for EACH foreign principal listed in an initial statement and for EACH additional foreign principal acquired subsequently. The filing of this document requires the payment of a filing fee as set forth in Rule (d)(1), 28 C.F.R. § 5.5(d)(1). Compliance is accomplished by filing an electronic Exhibit A form at <https://www.fara.gov>.

Privacy Act Statement. The filing of this document is required by the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, for the purposes of registration under the Act and public disclosure. Provision of the information requested is mandatory, and failure to provide this information is subject to the penalty and enforcement provisions established in Section 8 of the Act. Every registration statement, short form registration statement, supplemental statement, exhibit, amendment, copy of informational materials or other document or information filed with the Attorney General under this Act is a public record open to public examination, inspection and copying during the posted business hours of the FARA Unit in Washington, DC. Statements are also available online at the FARA Unit's webpage: <https://www.fara.gov>. One copy of every such document, other than informational materials, is automatically provided to the Secretary of State pursuant to Section 6(b) of the Act, and copies of any and all documents are routinely made available to other agencies, departments and Congress pursuant to Section 6(c) of the Act. The Attorney General also transmits a semi-annual report to Congress on the administration of the Act which lists the names of all agents registered under the Act and the foreign principals they represent. This report is available to the public in print and online at: <https://www.fara.gov>.

Public Reporting Burden. Public reporting burden for this collection of information is estimated to average .22 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to Chief, FARA Unit, Counterintelligence and Export Control Section, National Security Division, U.S. Department of Justice, Washington, DC 20530; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.

1. Name of Registrant CITGO Holding, Inc. ("CITGOH")		2. Registration Number 6955						
3. Primary Address of Registrant 1293 Eldridge Parkway, Houston TX 77077								
4. Name of Foreign Principal The Ad Hoc Board of Petróleos de Venezuela, S.A.	5. Address of Foreign Principal NA							
6. Country/Region Represented The Bolivarian Republic of Venezuela								
7. Indicate whether the foreign principal is one of the following:								
<input type="checkbox"/> Government of a foreign country ¹ <input type="checkbox"/> Foreign political party <input type="checkbox"/> Foreign or domestic organization: If either, check one of the following: <table border="0"> <tr> <td><input type="checkbox"/> Partnership</td> <td><input type="checkbox"/> Committee</td> </tr> <tr> <td><input type="checkbox"/> Corporation</td> <td><input type="checkbox"/> Voluntary group</td> </tr> <tr> <td><input type="checkbox"/> Association</td> <td><input checked="" type="checkbox"/> Other (<i>specify</i>) <u>Board of Directors of state-owned corporation</u></td> </tr> </table>			<input type="checkbox"/> Partnership	<input type="checkbox"/> Committee	<input type="checkbox"/> Corporation	<input type="checkbox"/> Voluntary group	<input type="checkbox"/> Association	<input checked="" type="checkbox"/> Other (<i>specify</i>) <u>Board of Directors of state-owned corporation</u>
<input type="checkbox"/> Partnership	<input type="checkbox"/> Committee							
<input type="checkbox"/> Corporation	<input type="checkbox"/> Voluntary group							
<input type="checkbox"/> Association	<input checked="" type="checkbox"/> Other (<i>specify</i>) <u>Board of Directors of state-owned corporation</u>							
<input type="checkbox"/> Individual-State nationality _____								
8. If the foreign principal is a foreign government, state:								
a) Branch or agency represented by the registrant								
b) Name and title of official with whom registrant engages								

¹ "Government of a foreign country," as defined in Section 1(e) of the Act, includes any person or group of persons exercising sovereign de facto or de jure political jurisdiction over any country, other than the United States, or over any part of such country, and includes any subdivision of any such group and any group or agency to which such sovereign de facto or de jure authority or functions are directly or indirectly delegated. Such term shall include any faction or body of insurgents within a country assuming to exercise governmental authority whether such faction or body of insurgents has or has not been recognized by the United States.

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9. If the foreign principal is a foreign political party, state:

- a) Name and title of official with whom registrant engages

- b) Aim, mission or objective of foreign political party

10. If the foreign principal is not a foreign government or a foreign political party:

- a) State the nature of the business or activity of this foreign principal.

The Ad Hoc Board of Petróleos de Venezuela, S.A. is the U.S. recognized representative of Venezuela's state-owned oil company Petróleos de Venezuela, S.A.

b) Is this foreign principal:

- | | |
|---|---|
| Supervised by a foreign government, foreign political party, or other foreign principal | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> |
| Owned by a foreign government, foreign political party, or other foreign principal | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> |
| Directed by a foreign government, foreign political party, or other foreign principal | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> |
| Controlled by a foreign government, foreign political party, or other foreign principal | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> |
| Financed by a foreign government, foreign political party, or other foreign principal | Yes <input type="checkbox"/> No <input type="checkbox"/> * |
| Subsidized in part by a foreign government, foreign political party, or other foreign principal | Yes <input type="checkbox"/> No <input type="checkbox"/> * |

*unknown

11. Explain fully all items answered "Yes" in Item 10(b).

Venezuela is the sole stockholder of Petróleos de Venezuela, S.A. ("PDVSA"), the Venezuelan state-owned oil and natural gas company. In February 2018, pursuant to the Statute that Governs the Transition to Democracy to Reestablish the Full Force and Effect of the Constitution of the Bolivarian Republic of Venezuela enacted by the Venezuelan National Assembly, Venezuela's Interim President, Juan Gerardo Guaidó Márquez, appointed the PDVSA Ad Hoc Board. In February 2019, Interim President Guaidó appointed a new ad hoc board for PDVSA, and Venezuela's National Assembly ratified his appointments.

12. If the foreign principal is an organization and is not owned or controlled by a foreign government, foreign political party or other foreign principal, state who owns and controls it.

In accordance with 28 U.S.C. § 1746, and subject to the penalties of 18 U.S.C. § 1001 and 22 U.S.C. § 618, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this statement filed pursuant to the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, that he/she is familiar with the contents thereof, and that such contents are in their entirety true and accurate to the best of his/her knowledge and belief.

Date

Printed Name

Signature

April 30, 2021

Carlos E. Jordá

/s/ Carlos E. Jordá

Pursuant to the Foreign Agents Registration Act of 1938, as amended

INSTRUCTIONS. A registrant must furnish as an Exhibit B copies of each written agreement and the terms and conditions of each oral agreement with his foreign principal, including all modifications of such agreements, or, where no contract exists, a full statement of all the circumstances by reason of which the registrant is acting as an agent of a foreign principal. Compliance is accomplished by filing an electronic Exhibit B form at <https://www.fara.gov>.

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Public Reporting Burden. Public reporting burden for this collection of information is estimated to average .32 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to Chief, FARA Unit, Counterintelligence and Export Control Section, National Security Division, U.S. Department of Justice, Washington, DC 20530; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.

1. Name of Registrant

CITGO Holding, Inc. ("CITGOH")

2. Registration Number

6955

3. Name of Foreign Principal

The Ad Hoc Board of Petróleos de Venezuela, S.A. ("the PDVSA Ad Hoc Board")

Check Appropriate Box:

4. ☐ The agreement between the registrant and the above-named foreign principal is a formal written contract. If this box is checked, attach a copy of the contract to this exhibit.
5. ☐ There is no formal written contract between the registrant and the foreign principal. The agreement with the above-named foreign principal has resulted from an exchange of correspondence. If this box is checked, attach a copy of all pertinent correspondence, including a copy of any initial proposal which has been adopted by reference in such correspondence.
6. ☐ The agreement or understanding between the registrant and the foreign principal is the result of neither a formal written contract nor an exchange of correspondence between the parties. If this box is checked, give a complete description below of the terms and conditions of the oral agreement or understanding, its duration, the fees and expenses, if any, to be received.
7. What is the date of the contract or agreement with the foreign principal? Please see response to Question 8.
8. Describe fully the nature and method of performance of the above indicated agreement or understanding.

CITGOH does not maintain an agreement or understanding with the PDVSA Ad Hoc Board for the activities relevant to this registration. The relationship between CITGOH and the PDVSA Ad Hoc Board derives solely from PDVSA's indirect ownership of CITGOH. CITGOH is a wholly-owned subsidiary of PDV Holding, Inc. ("PDVH"), which, in turn, is a wholly-owned subsidiary of Petróleos de Venezuela, S.A. ("PDVSA") as controlled by the PDVSA Ad Hoc Board.

9. Describe fully the activities the registrant engages in or proposes to engage in on behalf of the above foreign principal.

Please see attachment to Exhibit B.

10. Will the activities on behalf of the above foreign principal include political activities as defined in Section 1(o) of the Act¹.

Yes ☒ No ☐

If yes, describe all such political activities indicating, among other things, the relations, interests or policies to be influenced together with the means to be employed to achieve this purpose. The response must include, but not be limited to, activities involving lobbying, promotion, perception management, public relations, economic development, and preparation and dissemination of informational materials.

Please see attachment to Exhibit B.

11. Prior to the date of registration² for this foreign principal has the registrant engaged in any registrable activities, such as political activities, for this foreign principal?

Yes ☒ No ☐

If yes, describe in full detail all such activities. The response should include, among other things, the relations, interests, and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored, or delivered speeches, lectures, social media, internet postings, or media broadcasts, give details as to dates, places of delivery, names of speakers, and subject matter. The response must also include, but not be limited to, activities involving lobbying, promotion, perception management, public relations, economic development, and preparation and dissemination of informational materials.

Set forth below a general description of the registrant's activities, including political activities.

Because this is a retroactive registration, the response to Question 11 is yes. Please see attachment to Exhibit B filed concurrently with this registration.

Set forth below in the required detail the registrant's political activities.

Date	Contact	Method	Purpose
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Please see attachment to Exhibit B.

12. During the period beginning 60 days prior to the obligation to register³ for this foreign principal, has the registrant received from the foreign principal, or from any other source, for or in the interests of the foreign principal, any contributions, income, money, or thing of value either as compensation, or for disbursement, or otherwise?

Yes ☐ No ☒

If yes, set forth below in the required detail an account of such monies or things of value.

Date Received	From Whom	Purpose	Amount/Thing of Value
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Total

13. During the period beginning 60 days prior to the obligation to register⁴ for this foreign principal, has the registrant disbursed or expended monies in connection with activity on behalf of the foreign principal or transmitted monies to the foreign principal?

Yes ☐ No ☒

If yes, set forth below in the required detail and separately an account of such monies, including monies transmitted, if any.

Date	Recipient	Purpose	Amount
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¹ "Political activity," as defined in Section 1(o) of the Act, means any activity which the person engaging in believes will, or that the person intends to, in any way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

^{2,3,4} Pursuant to Section 2(a) of the Act, an agent must register within ten days of becoming an agent, and before acting as such.

In accordance with 28 U.S.C. § 1746, and subject to the penalties of 18 U.S.C. § 1001 and 22 U.S.C. § 618, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this statement filed pursuant to the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, that he/she is familiar with the contents thereof, and that such contents are in their entirety true and accurate to the best of his/her knowledge and belief.

Date	Printed Name	Signature
April 30, 2021	Carlos E. Jordá	/s/ Carlos E. Jordá
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

April 30, 2021

Question 9

Description of the activities the registrant engages in or proposes to engage in on behalf of the above foreign principal.

The activities that are the subject of this registration involve efforts by the U.S.-based CITGO entities to engage with the U.S. Government on one particular aspect of the Venezuelan sanctions regime, specifically General License 5. Until October of 2019, General License 5 exempted one subset of the Maduro regime's creditors from general prohibitions under the sanctions regime that otherwise would have precluded those creditors from executing on shares of CITGO Holding, Inc. that were purportedly attached as collateral to the so-called 2020 PDVSA bonds. The U.S.-based CITGO entities would have suffered harm had that license remained in operation when the Maduro regime defaulted on those bonds, as it was widely expected to do, in October of 2020. Anticipating that scenario, and hoping to avoid a number of harms that would have resulted to the CITGO entities in the event of a default over which the CITGO entities had no control, CPC and its U.S. parent companies met with representatives of a number of offices in the U.S. Executive and Legislative branches of government. In those meetings, the CITGO entities attempted to persuade the U.S. Government that General License 5 should be amended or repealed in order to avoid harm to CPC, including a potentially costly and destabilizing control contest involving years of litigation, and U.S. foreign policy objectives. One of those U.S. foreign policy objectives was promoting the transition of control over PDVSA from the Maduro regime to the Guaidó Government, and the CITGO entities explained why the policy objectives they favored would also promote that particular U.S. foreign policy objective. Eventually, the Executive Branch agreed that General License 5 should be modified, and suspended its operation on October 24, 2019.

Question 10

Description of political activities on behalf of the foreign principal as defined in Section 1(o) of the Act.

The engagements described above included in-person meetings, calls, and emails. The details regarding these activities are included in the index of communications filed as an attachment to the short-form registration statements filed concurrently with this registration.